

CORNERSTONE

Environmental Group, LLC

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VIA E-MAIL AND US MAIL

October 6, 2011

Mr. Jonathan Gorin
Remedial Project Manager
United States Environmental Protection Agency, Region II
290 Broadway
19th Floor
New York, New York 10007-1866

Subject: Monthly Progress Report for September 2011
LCP Chemicals, Inc. Superfund Site (USEPA ID# NJD079303020)

Dear Mr. Gorin:

The following monthly progress report is submitted on behalf of ISP Environmental Services Inc. (IES) in satisfaction of the Section VIII.35 requirements of Administrative Order No. II CERCLA-02-99-2015 (hereinafter referred to as the Order) issued by USEPA and as executed by IES on May 13, 1999.

A "Gantt Chart" project schedule is provided as an attachment (Figure 1). This project schedule provides graphical representations of the project tasks and subtasks. Accordingly, the project schedule depicts the task completion through the end of the reporting month and provides an estimate of the timing of future tasks.

1. Previous Actions in Compliance with the Order

A. The following actions have been taken to comply with the Order during the previous month:

- Work on the preparation of the FS report continued including various sections, figures, tables, appended support materials, and cost estimates.
- Evaluation of the results of the off-site ditch investigation continued, so that the final RI can be prepared in conjunction with resolution of the USEPA's remaining comments.

B. The following documents were submitted to the agencies during the previous month:

- Monthly progress letter report dated September 7, 2011, including an updated project schedule dated September 2, 2011.

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C. The following agency approvals were received during the previous month:

- None during the reporting period.

D. The following agency documents and correspondences were received during the previous month:

- None during the reporting period.

E. Other pertinent communications with the agencies during the previous month:

- None during the reporting period.

2. Future Actions, Data, and Plans

A. The following actions, data, and plans are scheduled to be conducted during the following two (2) months:

- Continue work on resolving comments from the USEPA on the *Draft Remedial Investigation Report* submitted by IES (awaiting response from the USEPA).
- Continue work on resolving comments from the USEPA on the *Draft Baseline Ecological Risk Assessment* submitted by IES (awaiting response from the USEPA).
- Continue work on the characterization of off-site ditches in accordance with the previously approved work plan and QAPP, and on updating the RI with the results of the ditch investigation.
- Complete a draft of the FS report and submit the draft to the USEPA at the end of November.
- Continue the quarterly site monitoring, with the next event planned for October.

B. Other information related to the progress of work:

- None during this reporting period.

3. Project Schedule

A. The percentage of completion of the project subtasks has been updated and is shown on the overall project schedule (Figure 1). Many of the schedule subtask details including the Phase I and Phase II RI field investigations and the treatability study determination process are 100% complete and have been collapsed for presentation brevity on Figure 1. The overall schedule is unchanged from that submitted with the August progress report.

B. Delays that have been encountered or anticipated that may affect the future schedule for completion of the work:

- No specific delays are being encountered at this time, and the current schedule reflects the various activities underway as described above. However, responses are still pending from the USEPA on the remaining comments on the RI and the ecological risk assessment. Not resolving the remaining comments by the beginning of November could alter the project schedule.

C. Description of efforts made to mitigate these delays or anticipated delays:

- None necessary at this time. The July 12, 2011 meeting with the USEPA and the Agency's concurrence on the alternatives to be evaluated in detail permit the FS process to continue per the attached schedule. However, as noted above, if the RI and ecological risk assessment are not completed soon pending USEPA's input on the remaining agency comments, the schedule for the project may be altered.

4. Funding Mechanism

- A. An Irrevocable Letter of Credit No. P-224827, issued by JP Morgan Bank effective April 25, 2002, and associated Standby Trust Agreement were issued in satisfaction of the financial assurance obligations of the Order as documented to USEPA in a letter from Celeste Wills, Esq. of IES, dated April 26, 2002.

If you or your staff has any questions or comments, please do not hesitate to contact David McNichol of IES at 973-628-3355.

Sincerely,

CORNERSTONE ENVIRONMENTAL GROUP, LLC

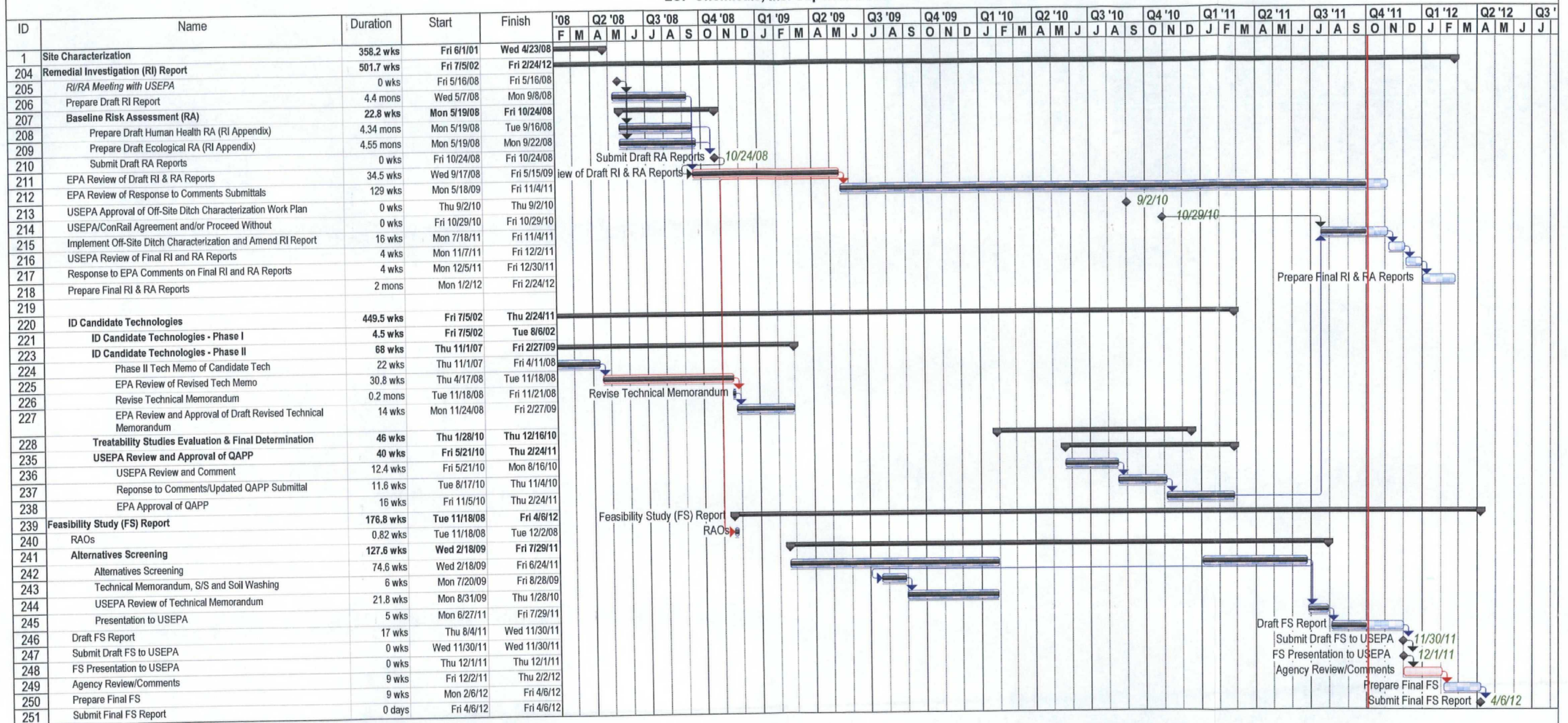


Gary J. DiPippo, P.E.
Manager, Hydrogeology and Remediation

Enclosure

cc: S. Miller, NJDHSS	C. McGowan, IES
F. Cardiello, Esq., USEPA	S. MacMillin, Brown and Caldwell
D. McNichol, IES	K. Tolson, Geosyntec
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Figure 1
RI/FS PROJECT SCHEDULE
LCP Chemicals, Inc. Superfund Site





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